

MEMO ENDORSED
Also mail confirmation will follow.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

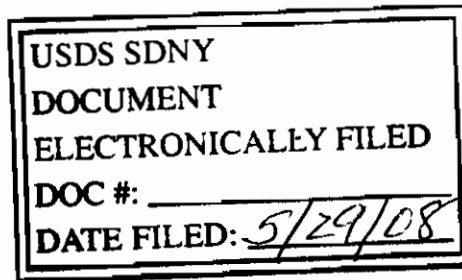
Case No. 07 CV 3540 (LTS) (JCF)

Dated May 12, 2008

Mansoor Alam
Plaintiff Pro-se
Vs,
HSBC Bank USA N.A.
Defendant

To

Hon. James C. Francis



Dear judge Francis:

1. Per your order I depose Mr. Ian L. Wright and K.P. Choi. Mr. Ian's testimony did not prove to be enough for lot of questions he referred to as Human Resources responsibility. Mr. Javier Evan runs the Human Resources department and also a decision maker and I firmly believe that he has full information relevant to my case, therefore I must depose Javier Evan in order to have admissible evidences. You are therefore earnestly requested to order HSBC counsel to present Javier Evan to be deposed before the discovery period ends which is May 15, 2004. If the period is too short may be extended for further reasonable period of time say about two to three weeks.

2. They have presented demographical information of the employees of export/import department but there are inconsistencies and inaccuracies.

3. In compliance with the order, they have provided performance evaluation of all document examiner in the export/import who were rated "4" (marginal) which is very helpful but to find more admissible evidences I have to have copy of actual input of each employee of import/export department for 2004, because I have observed that opponent is always trying to avoid complying with discovery request by claiming ambiguities in question, vague, cumbersome etc.

4. I have already mentioned in deposition that I need to have ages of the following:

- a) Elsie Leung (never produced)
- b) Rowana Leung (never produced)

- c) Marvin Lee
- d) Nox Chan
- e) Vincent Urban
- f) Kin Chung Yiu
- g) Mehmet Rashi Ozturkmen
- h) Dinesh Wijesinghe
- i) Nadia Taran
- j) Tony Batac
- k) Savita Deokeenandon
- l) Guadalupe Rivera

along with the copy of passport or birth certificate or driving license to verify their ages because I know that opponent has presented and will present very different version of facts.

Respectfully submitted

Mansoor Alam

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CC. HSBC Bank counsel

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5/29/08

Applications denied. Plaintiff has not adequately demonstrated the relevance of the additional discovery requested, apart from that which the defendant has produced, as indicated in the letter of defendant's counsel dated May 16, 2008. Discovery is closed. Any dispositive motion shall be filed by June 27, 2008.

SO ORDERED,
James C. Francis IV
USMJ